

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

FEB - 1 2018

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON ERVIN,

Defendants.

4:18CR78 CDP/NCC

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited one-hundred-dollar Federal Reserve Note, Serial No. KB46279860I, in violation of Title 18, United States Code, Section 471.

**COUNT 2**

**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited fifty-dollar Federal Reserve Note, Serial No. EL34331474A, in violation of Title 18, United States Code, Section 471.

**COUNT 3**  
**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited twenty dollar Federal Reserve Note, Serial No. ID22899960B, in violation of Title 18, United States Code, Section 471.

**COUNT 4**  
**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited twenty dollar Federal Reserve Note, Serial No. ID22849967B, in violation of Title 18, United States Code, Section 471.

**COUNT 5**  
**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited twenty dollar Federal Reserve Note, Serial No. MK09830306F, in violation of Title 18, United States Code, Section 471.

**COUNT 6**  
**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited twenty dollar Federal Reserve Note, Serial No. JF74696455C, in violation of Title 18, United States Code, Section 471.

**COUNT 7**  
**COUNTERFEITING AND FORGING SECURITIES: 18 U.S.C. § 471**

On or about January 18, 2018, in the Eastern District of Missouri, the defendant,

**BRANDON ERVIN,**

with intent to defraud, did falsely make, forge, and alter an obligation of the United States, that is, a falsely made, forged and counterfeited ten dollar Federal Reserve Note, Serial No. GL64739922A, in violation of Title 18, United States Code, Section 471.

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B) and Title 18, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 471, as set forth in Counts One through Seven, the defendants shall forfeit to the United States of America:

- a. all counterfeits of any coins or obligations or other securities of the United States or of any foreign government, or any articles, devices, and other things made, possessed, or used in said offense, or any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles,

devices or things; and

- b. any property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as the result of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, proceeds the defendants obtained, directly or indirectly, as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Gwendolyn E. Carroll  
Assistant United States Attorney